

KRISS & FEUERSTEIN LLP

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Hearing Date: January 8, 2016; 10:00 a.m.

Objection Deadline: December 31, 2015

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Case No. 15-22710-rdd

56 MILBANK AVENUE, LLC,

Chapter 11

Debtor.
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PLEASE TAKE NOTICE, that upon the annexed Application, the Affidavit of Shoshana Carmel, the Memorandum of SDF77 Greenwich LLC (the “Secured Creditor”), a secured creditor of the debtor and debtor-in-possession, 56 Milbank Avenue, LLC (the “Debtor”), and an interested party in this Chapter 11 case, by and through its attorneys, Kriss & Feuerstein LLP, will move this Court before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the Southern District of New York, One Bowling Green, New York, New York 10004 on the **8th day of January, 2016 at 10:00 a.m.**, or as soon thereafter as counsel can be heard pursuant to 11 U.S.C. § 1121(d), for the entry of an Order pursuant to 11 U.S.C. § 1121(d) terminating the Debtor’s exclusivity periods, and authorizing the Secured Creditor to propose a Chapter 11 Plan, and for such further and different relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the instant application must be made in writing and received in the Bankruptcy Clerk’s Office, United States Bankruptcy Judge, at the Southern District of New York, One Bowling Green, New York, New York 10004 and by the undersigned, Kriss & Feuerstein LLP, 360 Lexington Avenue, Suite 1200, New York, New York 10017, not later than seven (7) days prior to the hearing date set forth herein.

Dated: December 22, 2015
New York, New York

KRISS & FEUERSTEIN LLP
Attorneys for SDF77 Greenwich LLC

By: s/ Jason S. Leibowitz
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